

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

LeClairRyan PLLC,¹

Debtor.

Chapter 7

Case No. 19-34574 (KRH)

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

**ULX Partners, LLC, ULX Manager, LLC,
UnitedLex Corporation, and Gary LeClair,**

Defendants.

Adv. Proc.: 20-03142-KRH

**MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE*,
UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Brittany J. Nelson (“**Movant**”) a member in good standing of the Virginia State Bar, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and an attorney with the law firm of Quinn Emanuel Urquhart & Sullivan LLP, hereby moves the Court to enter an order admitting Rex Lee (the “**Proposed Admittee**”), Counsel in the

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

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law firm Quinn Emanuel Urquhart & Sullivan, 51 Madison Avenue, New York, NY 10010, to appear *pro hac vice* in the above-captioned Chapter 7 case (the “**Bankruptcy Case**”) and related adversary proceedings proceeding for the purpose of representing Lynn L. Tavenner, as Chapter 7 Trustee (the Plaintiff in Adv. Pro. No. 20-03142-KRH) pursuant to Local Bankruptcy Rule 2090-1(E)(3) (the “**Motion**”). In support of this Motion, Movant states as follows:

Rex Lee is a member in good standing of the Bar of the State of New York and is admitted to practice in the United States District Court for the Southern District of New York and the United States District Court for the Eastern District of New York.

Mr. Lee has never been disbarred, suspended, or denied admission to practice.

Mr. Lee understands that if he is admitted *pro hac vice* to practice before this Court, he will be subject to the local rules and disciplinary jurisdiction of this Court.

The Movant requests that this Court authorize the Proposed Admittee to file pleadings, to appear and be heard at hearings, and to otherwise participate in the Bankruptcy Case and all related proceedings, including specifically, the adversary proceedings referenced above.

A copy of Mr. Lee’s written application required by Local Bankruptcy Rule 2090-1(E)(3) is attached hereto as to Exhibit A and incorporated by reference into this Motion.

Notice of this Motion will be served on the Office of the United States Trustee for the Eastern District of Virginia and counsel for the Debtor. Because of the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

WHEREFORE, Movant respectfully requests that the Court enter an order substantially in the form annexed hereto (i) permitting Mr. Lee to appear *pro hac vice* in association with Movant as counsel to Lynn L. Tavenner, as Chapter 7 Trustee (the Plaintiff in Adv. Pro. No. 20-03142-KRH) and (ii) granting such other relief as is just.

Respectfully submitted,

/s/ Brittany J. Nelson

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*Special Counsel to Lynn L. Tavenner, Chapter 7
Trustee*

CERTIFICATE OF SERVICE

I hereby certify that on this October 13, 2021, the foregoing *Motion for Admission to Practice Pro Hac Vice Under Local Bankruptcy Rule 2090 – 1(E)(3)* was filed with the Clerk of Court using the CM/ECF system, which caused the same to be served upon all parties registered to receive CM/ECF notice in the above-captioned bankruptcy case.

/s/ Brittany J. Nelson
Brittany J. Nelson